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Attorney for Plaintiff
SEAN MICHAEL CARTER

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

SEAN MICHAEL CARTER,

Plaintiff,

v.

NATIONWIDE MUTUAL INSURANCE
COMPANY,

Defendants.

Case No. C 07 5588 CRB

**PLAINTIFFS' INITIAL DISCLOSURES
PURSUANT TO FRCP 26(a)(1)**

Plaintiff SEAN MICHAEL CARTER hereby submits her initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Sean Michael Carter – contact through counsel.

Attorneys and employees of Nationwide Mutual Insurance Company

B. DOCUMENTS TO BE USED TO SUPPORT CLAIM

Along with the transmittal of these Initial Disclosures, plaintiff is providing counsel with the Nationwide Mutual Insurance Company Policy "Certificate" Number FWC0000000885800 and correspondence by and between K&K Insurance and Sean Michael Carter.

Additional documents that plaintiff is in possession of and are available for copying are as follows:

1. Medical Records for Plaintiff copied on November 15, 2006 from John Muir Medical Center (648 pages) bearing control number 19458-5-1.
2. Medical Records for Plaintiff copied on October 30, 2006 from Oak Park

1 Convalescent Hospital. Documents from January 10, 2006 through October 18,
2 2006 (1,013 pages, 2 volumes) bearing control number 19458-7-1.

3 3. Medical Records for Plaintiff copied on June 8, 2006 from John Muir Hospital
4 (2,489 pages, 5 volumes) bearing control number 19458-1-1.

5 4. Medical Records for Plaintiff copied on May 15, 2006 from Santa Clara Valley
6 Medical Center (892 pages, 2 volumes) bearing control number 19458-2-1.

7 5. Medical Records for Plaintiff copied on May 24, 2006 (62 pages) bearing control
8 number 19458-3-1.

9 6. Medical Records for Plaintiff copied on November 9, 2006 from Oak Park
10 Convalescent Hospital (2 pages) bearing control number 19458-8-1.

11 7. Medical Records for Plaintiff copied on December 6, 2006 from Health
12 Management Services (12 pages) bearing control number 19458-9-1.

13 8. Medical Records for Plaintiff copied on September 12, 2007 from American
14 Medical Response (109 pages) bearing control number 19458-10-1.

15 **C. COMPUTATION OF DAMAGES**

16 Plaintiff seeks special damages according to proof, general damages according to proof,
17 punitive and exemplary damages in an amount appropriate to punish Defendants and set an
18 example for others, prejudgment interest, as well as interest, attorney fees, and costs, and such
19 other and further relief as the Court may deem just and proper, under 29 U.S.C. § 1132(g)(1).

20 **D. INSURANCE AGREEMENT**

21 A copy of the Nationwide Mutual Insurance Company Policy "Certificate" Number
22 FWC0000000885800 has been included in the attached documents.

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By: /s/
 Lee S. Harris
 Michael W. Flynn
 Attorney for Plaintiff
 SEAN MICHAEL CARTER